

BLANK ROME LLP

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Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,

Case No. 2:24-CV-04546-SB(AGR_x)

Hon. Stanley Blumenfeld, Jr.

**JOINT STATEMENT OF
AMENDED PROPOSED
TRADEMARK JURY
INSTRUCTIONS IN RESPONSE
TO DKT. NO. 292**

Complaint Filed: May 31, 2024
Trial Date: September 12,
2025

1 a California limited liability company; and,
2 GK CAPITAL GROUP, LLC, a California
3 limited liability company and DOES 1
4 through 100, inclusive,

5 Defendants.

6 PCJV USA, LLC, a Delaware limited
7 liability company; PCI TRADING LLC, a
8 Delaware limited liability company;
9 POTATO CORNER LA GROUP LLC, a
10 California limited liability company; GK
11 CAPITAL GROUP, LLC, a California
12 limited liability company; NKM CAPITAL
13 GROUP LLC, a California limited liability
14 company; and GUY KOREN, an individual,

15 Counter-Claimants,

16 v.

17 SHAKEY'S PIZZA ASIA VENTURES,
18 INC, a Philippines corporation,

19 Counter Defendant.

20 PCJV USA, LLC, a Delaware limited
21 liability company; PCI TRADING LLC, a
22 Delaware limited liability company;
23 POTATO CORNER LA GROUP LLC, a
24 California limited liability company; GK
25 CAPITAL GROUP, LLC, a California
26 limited liability company; NKM CAPITAL
27 GROUP LLC, a California limited liability
28 company; and GUY KOREN, an individual,

29 Third Party Plaintiffs,

30 v.

31 PC INTERNATIONAL PTE LTD., a
32 Singapore business entity; SPAVI
33 INTERNATIONAL USA, INC., a California
34 corporation; CINCO CORPORATION, a
35 Philippines corporation; and ROES 1 through
36 10, inclusive,

37 Third Party Defendants.

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The parties jointly submit their proposed amended trademark jury instructions in response to Dkt. No. 292. Attached as **Exhibit 1** is a true and correct copy of Plaintiff's proposed amended trademark jury instructions. Attached as **Exhibit 2** is a true and correct copy of a redline between Plaintiff's proposed amended trademark jury instructions attached as Exhibit 1 and the corresponding trademark jury instructions included in Dkt. No. 260. Attached as **Exhibit 3** is a true and correct copy of Defendants' proposed amended trademark jury instructions. Attached as **Exhibit 4** is a true and correct copy of a redline between Defendants' proposed amended trademark jury instructions attached as Exhibit 3 and the corresponding trademark jury instructions included in Dkt. No. 260.

DATED: September 5, 2025 **BLANK ROME LLP**

By: /s/ Todd M. Malynn

Todd M. Malynn

Arash Beral

Jamison T. Gilmore

Attorneys for Defendants, Counterclaimants,
and Third Party Plaintiffs PCJV USA, LLC,
PCI TRADING LLC, POTATO CORNER,
LA GROUP, LLC, GK CAPITAL GROUP,
LLC, NKM CAPITAL GROUP, LLC and
GUY KOREN, and Defendants J & K
AMERICANA, LLC, J&K LAKEWOOD,
LLC, J&K OAKRIDGE, LLC, J&K
VALLEY FAIR, LLC, J & K ONTARIO,
LLC, J&K PC TRUCKS, LLC, HLK
MILPITAS, LLC, and GK CERRITOS, LLC

1 DATED: September 5, 2025 **FOX ROTHSCHILD LLP**

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3
4 By: /s/ Michael D. Murphy
5 Michael D. Murphy
6 Matthew Follett
7 Fox Rothschild LLP
8 *Attorneys for Plaintiff and Counterclaim*
9 *Defendant, and Third Party Defendants*
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ATTESTATION OF E-FILED SIGNATURE

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Todd M. Malynn, hereby attest that I have obtained concurrence in the filing of this document from the other signatories to this document. I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

DATED: September 5, 2025 **BLANK ROME LLP**

By: /s/ Todd M. Malynn

Todd M. Malynn

Arash Beral

Jamison T. Gilmore

Attorneys for Defendants, Counterclaimants,
and Third Party Plaintiffs PCJV USA, LLC,
PCI TRADING LLC, POTATO CORNER,
LA GROUP, LLC, GK CAPITAL GROUP,
LLC, NKM CAPITAL GROUP, LLC and
GUY KOREN, and Defendants J & K
AMERICANA, LLC, J&K LAKEWOOD,
LLC, J&K OAKRIDGE, LLC, J&K
VALLEY FAIR, LLC, J & K ONTARIO,
LLC, J&K PC TRUCKS, LLC, HLK
MILPITAS, LLC, and GK CERRITOS,
LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on September 5, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on September 5, 2025.

By: /s/ AJ Cruickshank